

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LEHMAN BROTHERS HOLDINGS,
INC. DERIVATIVE LITIGATION

[illegible]

07 Civ. 2990 (DAB)

Electronically Filed

DEMAND FOR JURY TRIAL

NOTICE OF MOTION TO JOIN THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL NO. 38 PENSION FUND AS A PLAINTIFF

PLEASE TAKE NOTICE that pursuant to Rule 20(a) of the Federal Rules of Civil Procedure, Lead Plaintiffs Robert L. Garber (“Garber”) and Saginaw Police and Fire Pension Board (“Saginaw”), and the International Brotherhood of Electrical Workers Local No. 38 Pension Fund (“IBEW”), will hereby move this court for an Order permitting the joinder of IBEW as an additional plaintiff in this action.

The reasons for joinder are set forth in the supporting memorandum of law filed herewith. The Defendants have consented to this motion.

Dated: December 28, 2007

Respectfully submitted,

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